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Proceeding to establish prices for BellSouth Telecommunications, Inc.'s Interconnection Services, Unbundled Network Elements and other related elements and services

Docket No. 2001-65-C



Testimony of David S. Lacoste Utilities Department

Public Service Commission of South Carolina

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O. PLEASE STATE YOUR NAME, OCCUPATION AND DESCRIPTION OF YOUR BACKGROUND.

A. I am David Lacoste. I received a BS Degree in Electrical Engineering from the University of South Carolina in 1978 and am employed by the Public Service Commission of South Carolina as an Engineer (Associate) within the Commission's Utilities Department. I am responsible for inspections and audits concerning telecommunications service quality and am extensively involved in the review of certification applications, tariffs and interconnection agreements.

O. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. My testimony's purpose is to offer exhibits concerning depreciation rates utilized by BellSouth as part of this UNE filing. I am specifically addressing testimony presented by BellSouth witness David Cunningham.

Q. DOES THIS COMMISSION SET BELLSOUTH'S DEPRECIATION RATES?

A. No. As a result of BellSouth's election of 'Alternative Regulation' (S.C. Code Ann. Section 58-9-576 (Supp. 2000)) the Commission does not set depreciation rates for BellSouth. I will comment that the Staff considers depreciation rates that are part of this filing to be among many factors to be considered in establishing UNE rates. This is not a depreciation filing.

Q. HAVE YOU ANALYZED SERVICE LIVES OF THE VARIOUS PLANT **ACCOUNTS?**

A. Yes. Exhibit I shows, in part, a comparison between BellSouth's Economic Projection Lives used in its current study and Projection Lives used in a 1992 study. This Docket (92-227-C) was the last in-depth analysis undertaking by the Commission Staff in a depreciation rate case involving BellSouth. The 'Big Dollar' accounts (Digital Switching, Circuit Equipment, Aerial, Underground & Buried Metallic Cable and Conduit) are highlighted for clarity. The comparison shows that BellSouth has decreased life expectations for its central office and most cable facilities. The decrease in service life from

- 25 years to 14 years for Underground Metallic Cable is rather dramatic. Also 1 2 shown are Projection Lives (where available) used in the generation of depreciation rates for Alltel, Verizon and the FCC. 3
 - Q. DO YOU HAVE CONCERNS WITH THE ACTUAL DEPRECIATION RATES USED BY BELLSOUTH IN CONJUNCTION WITH THIS FILING?
 - A. No, I do not. My Exhibit II compares BellSouth's depreciation rates with rates currently in use by the four largest ILECs operating in the state (Verizon, Sprint / United, Alltel, and Horry Co-Op). This exhibit also shows rates approved by the FCC for interstate purposes. In my opinion, the BellSouth rates associated with the individual plant accounts are generally in line with the FCC and other carrier's rates. Based on year end 2000 annual report information filed with the Commission, BellSouth's overall reported composite of 6.8% is the lowest of the compared rates. I would like to point out that the Commission, in its previous order addressing UNE rates (DN 97-374-C), directed that depreciation rates approved in the 1992 Depreciation Rate case filing should be used as cost inputs.
 - Q. DOES THIS CONCLUDE YOUR TESTIMONY?
 - A. Yes it does.

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SERVICE LIFE (YRS) COMPARISON UNE DOCKET NO. 2001-65-C

EXHIBIT I

CATEGORY OF PLANT (Foral BellSouth Investments %);	BELLSOUH PROPOSED PROJECTION LIFE	BELLSOUH - LIEE LIHEIZED IN DN 92- 227-2C	FCG = INTERSTATE UTILIZEDIN 1995 SEUDY	VERIZON f/k/a/GTE ± EHEE EHEIZED IN DN 97-125-C	ALLTEL LIFE FERLIZEDIN DN 97-360-G-2
2112 - Motor Vehicles (.1%)	8	8.6			
2114 - Garage Work Equipment (.1%)	12	11.4	12		
2114 - Other Work Equipment (1%)	15	12.6	15		
2121 - Buildings (4%)	45	37	42		
2122 - Furniture (.1%)	15	10.7	12.5		
2123 - Office Support Equipment (.1%)	11.5	8.1	11.5		
2124 - General Purpose Computers (1%)	4.5	6.5	5.5		
2212 - Digital Switching Equipment (18%)	10	13.8	16	17 10	
2220 - Operator Systems (.2%)	10	11.2	10		
2232.1 - Digital Circuit Equipment (22%)	و و	7 8.8 2	fo.5	gibb i	9 2 0 2 2
2232.1 - Digital Circuit Data Service Equipment (.2%)	8	8.3	6		
2232 -Analog Circuit Equipment (1%)	7.5		7		
2362 - Other Terminal Equipment (1%)	6	7	6		
2411 - Poles (1%)	36	27	35		
2421.15 Aerial Cable (Metallic) (5%)	ls a	18.6	18	4 2 17 7 12	1.138
2421.2 - Aerial Cable - Fiber (.2%)	20	17.9	25	25	
2422.1 - Underground Cable» - Metallic (4%)	14	25	24		F 18 18 18 18 18 18 18 18 18 18 18 18 18
2422.2Underground Cable (Fiber) (1.6%)	20	24	25	25	ALL NOV BOS DETENTION
24231 - Buried Cable Mefallic (30%)*	JŠI -	12185	18	17	18 3
2423.2 - Buried Cable - Fiber (3%)	20	20	25	25	
2426 - Intrabuilding Network Cable (.4%)	20	21	22		
2441 - Conduit Systems (4%)	#155E4	€ izen:58°= ;;	60		

DEPRECIATION RATE (%) COMPARISON UNE DOCKET NO. 2001-65-C

, ,]	EXHIBIT II		ACCEP1				
CATEGORY OF PLANT (Total BellSouth Investment %)	BELLSOUH ~ 1.5M Access Lines	BELLSOUH Approved DN 92-227-C and Utilized in Present	VERIZON f/k/a GTE =195 Access	UNITD ~95,000s Access Lines	HORRY TELEPHONE ~ 94,000 Access Lines	ALL-TEL ~62,000 s Access Lines	ECC (Interstate - Effective 1/1/95)	FOR I
ar Sills male translation		UNE Prices	Lines					PR(
2112 - Motor Vehicles (.1%)	10.3	5.7	12.1	11.7	16.3	9.4	12.6	OCE
2114 - Garage Work Equipment (.1%)	15.8	20.5	3.3			4.4	13.2	SSING
2114 - Other Work Equipment (1%)	7.1	6.8	6.8	10.0	10.0	4.4	7.1	NG-
2121 - Buildings (4%)	2.6	2.4	4.1	3.0	3.2	2.3	2.4	2019
2122 - Furniture (.1%)	6.0	9.1	3.6	5.0	8.3	7.5	5.6	9 Nc
2123 - Office Support Equipment (.1%)	8.1	12.3	24.4	5.0	10.3	8.2	6.2	November
2124 - General Purpose Computers (1%)	18.7	20.5	31	15.0	18.1	23.1	16.1	er 14 3:2
2212 - Digital Switching Equipment (18%)	9.4	39.2 %	TO A	7.9	12. 9	777 2777 243	7.6	26 PM
2220 - Operator Systems (.2%)	13.6	9.6	20.8				11.1	-SC
±(2232:1 -Digital Gircuit Equipment (22%)	Martiner 8,3 cm s	11.9	12.1	10.6	19.97 30.97	11.9	9.0	CPSC -
2232.1 - Digital Circuit Data Service Equipment (.2%)	10.9	13.7					20.1	2001-6
2232 -Analog Circuit Equipment (1%)	2.3						19.6	65-C
2362 - Other Terminal Equipment (1%)	6.2	8.9	3.5	25.0			7.1	- Page
2411 - Poles (1%) 242101 - Aerial	4.2	5.7	6.6	6.1	8.3	6.3	6.8	2
Cable (Metallic) (5%)	5.9	5.6	8.3	5:0 F 3:	9 - 6 d - 2 - 1	78	5.0	of 5
2421.2 - Aerial Cable - Fiber (.2%)	7.0	6.5	4.1	5.0	6.0	5.3	6.1	
2422.12. Underground Cable Metallic (4%)	3.7	4.7 4.7	8:3 23:3 23:37:37:47	6.2 3	5.0 4.41	3 31.12 5 .81.4-19	45	
2422.2Underground Cable (Fiber) (1.6%)	5.8	4.3	4.4	2.9	5.0	4.6	5.2	
24231 ∋Buried Cable - Metallic (30%)	5,61	64	76.5m L	6.5	6.0	63	66	
2423.2 - Buried Cable - Fiber (3%)	6.1	4.8	4.9	4.9	5.0	5.7	4.7	
2426 - Intrabuilding Network Cable (.4%)	5.4	5.4	3.7	6.0			4.4	
2441—Conduit Systems (4%)	2.2	1.9	2.4	2.0	2.50 2.50 2.50	1.9	1.9	
Composite Rate (Y/E	'00) 6.8		9.1	7.4	8.0	7.7		